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Electronically Filed: January 30, 2014

Attorneys for Chapter 7 Trustee,
 William A. Leonard, Jr.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re)	CASE NO. BK-S-09-32824-RCJ (Lead Case)
)	
ASSET RESOLUTION, LLC,)	Jointly Administered with Case Nos.:
)	BK-S-09-32831-RCJ; BK-S-09-32839-RCJ;
Debtor.)	BK-S-09-32843-RCJ; BK-S-09-32844-RCJ;
)	BK-S-09-32846-RCJ; BK-S-09-32849-RCJ;
)	BK-S-09-32851-RCJ; BK-S-09-32853-RCJ;
)	BK-S-09-32868-RCJ; BK-S-09-32873-RCJ;
Affects:)	BK-S-09-32875-RCJ; BK-S-09-32878-RCJ;
<input checked="" type="checkbox"/> All Debtors)	BK-S-09-32880-RCJ; BK-S-09-32882-RCJ
)	
)	Chapter 7
)	
WILLIAM A. LEONARD, JR., Chapter 7)	ADV. CASE NO. 13-01196-RCJ
Trustee,)	
)	
Plaintiff,)	DECLARATION OF JONATHAN S.
)	DABBIERI IN SUPPORT OF REQUEST
v.)	FOR ENTRY OF DEFAULT AGAINST
)	COMPASS USA SPE, LLC
COMPASS USA SPE, LLC, a Delaware)	
Limited Liability Company; PLATINUM)	Ctrm: RCJ - Courtroom 6
FINANCIAL TRUST, LLC; an Indiana)	Bruce R. Thompson Federal Building
Limited Liability Company)	400 S. Virginia Street
)	Reno, NV 89501
)	Judge: Hon. Robert C. Jones
Defendants.)	

I, Jonathan S. Dabbieri, hereby declare under penalty of perjury of the laws of the United States and pursuant to 28 U.S.C. § 1746 that the following is true to the best of my knowledge and belief:

1. I am an attorney licensed to practice law in the state of California. I have been admitted pro hac vice before this Court to represent the named Plaintiff, William A Leonard, Chapter

1 7 Trustee (“Trustee”) for the Asset Resolution, LLC Bankruptcy Estate (“Estate”). The statements in
2 this declaration are based on my personal knowledge and are true.

3 2. On or about October 23, 2013, I commenced the above-referenced adversary case on
4 behalf of the Estate by filing a Complaint (the “Complaint”) seeking recovery of all rights, title and
5 interest in and to the certain property situated in the City of Fort Meyers, Lee County, State of
6 Florida described more particularly in Exhibit A to the complaint (“Property”) and turnover of the
7 property with profits or proceeds thereof paid to Defendant Compass USA (“Defendant”). *See* Dkt.
8 No. 1. The Summons was issued by this Court on October 24, 2013.

9 3. Defendant is a limited liability company and is therefore not subject to military
10 service, nor a minor and is not incompetent.

11 4. On or about October 31, 2013, the summons was served on Compass USA by Jamie
12 Vidovich (a paralegal working under my supervision) via the United States Mail. The Certificate of
13 Service was filed with this Court on January 29, 2014. *See* Dkt. No. 14.

14 5. Pursuant to Rule 7012 of the Federal Rules of Bankruptcy Procedure, the deadline for
15 Defendant to answer or otherwise respond to the Complaint was November 25, 2013.

16 6. The Defendant has failed to file an answer or other response to the Complaint or
17 plead or otherwise defend the claims in the Complaint.

18 I declare under penalty of perjury that the foregoing is true and correct and that this
19 declaration was executed on January 30, 2014 at San Diego, California.

20 /s/ Jonathan S. Dabbieri

21 Jonathan S. Dabbieri